

### **Remarks**

Applicant respectfully requests reconsideration of this application as amended. No claims have been amended. No claims have been cancelled. Therefore, claims 1-33 are presented for examination.

Claims 1-3, 8, 10, 14-17, 21, 23-25, and 31-33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Shimoi et al. (U.S. Patent No. 5,652,857), Corcoran et al. (U.S. Patent No. 6,449,689), Kim et al. (U.S. Patent No. 6,859,870), and Kever (U.S. Pub. No. 2003/0131184). Applicant submits that the present claims are patentable over any combination of Shimoi, Corcoran, Kim and Kever.

Shimoi discloses a disk control apparatus for recording and reproducing compression data to physical device of direct access type. The apparatus includes a cache memory between a host computer and a disk drive. The cache memory is divided into a non-compression cache memory for storing non-compression data on a logic block unit basis and a compression cache memory for storing compression data on a compression group unit basis having the same size as that of the logic sector of the disk drive. A compressing circuit extracts the data stored in the non-compression cache memory on a logic block unit basis and compresses the data. A compression group forming unit collects the compression data of the logic block unit by the compressing circuit unit, thereby forming a compression group and storing the compression group into the compression cache memory. An expanding circuit unit extracts the data stored in the compression cache memory on a compression group unit basis, expands, and develops into the non-compression cache memory. See Shimoi at col. 3, ll. 23-65.

Corcoran discloses a system and method for organizing compressed data on a storage disk to increase storage density. The method and system include a compressor for compressing a data block into a compressed data block, wherein  $N$  represents a compression ratio. The storage disk includes a first storage partition having  $N$  slots for storing compressed data, and a second storage partition also having  $N$  slots for storing overflow data. Each of the  $N$  slots in the first partition includes at least one address pointer for pointing to locations in the second partition. According to a further aspect of the system and method, if the compressed data block is less than or equal to  $1/N$  of the data block size, then the compressed data block is stored in a first slot in the first storage partition. If the compressed data block is greater than  $1/N$  of the data block size, then the first  $1/N$  of the compressed data block is stored in the first slot in the first storage partition and a remainder of the compressed block is stored in one or more slots in the second storage partition. The address pointer in the first slot is then updated to point to the one or more slots in the second storage partition. See Corcoran at Abstract.

Kim discloses an instruction being stored in main memory in an uncompressed format and being compressed before being stored in a cache memory. See Kim at col. 1, ll. 61-67.

Kever discloses that if a compression ratio is less than or equal to 0.5, a search is performed, for a tag array element pointing to a half-length data storage line subsection in an associated set which is both invalid and available. If no such tag array element is found, a victim line of data is selected and written to a memory. A compressed line is written into the selected half-length subsection. The half-length subsection is marked as "valid" and "unavailable" per indicators. The compression indicator is written to indicate that the line of

data is compressed, and the tag entry is updated to point to the written half-length subsection. See Kever at paragraph [0022].

Claim 1 of the present application recites a cache controller having compression logic to determine that a retrieved cache line is to be combined with a resident companion cache line to form the compressed cache line if the companion cache line is resident in the cache memory and to store the compressed cache line in the cache line of the resident companion. Applicant submits that Shimoi, Corcoran, Kim and Kever all fail to disclose or suggest a process of determining that a cache line retrieved from memory is to be combined with a resident companion cache line to form a compressed cache line if the companion cache line is resident in the cache memory.

Kever has been cited as disclosing such a feature, particularly at paragraph [0022]. Nonetheless, Kever discloses selecting and writing a victim line of data to a memory if no tag array element is found pointing to a half-length data storage line subsection in an associated set which is both invalid and available. There is no disclosure, or reasonable suggestion, in Kever of *determining that a cache line retrieved from memory is to be combined with a resident companion cache line to form a compressed cache line if the companion cache line is resident in the cache memory.*

Since Shimoi, Corcoran, Kim and Kever all fail to disclose or suggest determining that a cache line retrieved from main memory is to be combined with a resident companion cache line to form a compressed cache line if the companion cache line is resident in the cache memory and storing the compressed cache line in the cache line of the resident companion, any combination of Shimoi, Corcoran, Kim and Kever would also fail to disclose or suggest such features. Therefore claim 1, and its dependent claims, is patentable over the

combination of Shimoi, Corcoran, Kim and Kever since none of the references disclose or suggest processes.

Independent claims 15, 24 and 31 include limitations similar to those recited in claim 1. Thus, claims 15, 24 and 31, and their respective dependent claims, are patentable over the combination of Shimoi, Corcoran, Kim and Kever for the reasons stated above with respect to claim 1.

Claims 4-7, 9, 18-20, 22, and 26-30 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Shimoi, Corcoran, Kever, and Kim and further in view of Obara (U.S. Patent No. 6,115,787). Further, claims 11-13 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Shimoi, Corcoran, Kever, and Kim and further in view of Cypher (U.S. Patent No. 6,629,205). Applicant submits that the present claims are patentable over any combination of Shimoi, Corcoran, Kim, Kever, Obara and Cypher since none of the references alone, or in combination, disclose or suggest determining that a cache line retrieved from main memory is to be combined with a resident companion cache line to form a compressed cache line if the companion cache line is resident in the cache memory and storing the compressed cache line in the cache line of the resident companion.

Applicant submits that the rejections have been overcome and that the claims are in condition for allowance. Accordingly, applicant respectfully requests the rejections be withdrawn and the claims be allowed.

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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